

HMK/jb MS 7869

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MACSTEEL INTERNATIONAL USA CORP.

Plaintiff,

07 CIV 6039 (LAK)(MHD)  
ECF CASE

-against-

M/V GREAT RIVER, her engines, boilers,  
tackle, etc., CIDO SHIPPING (HK) CO.,  
LTD., CIDO SHIPPING KOREA CO., LTD.,  
WHITE PINE SHIPPING SA, BULK LOGISTICS  
LTD.,

**NOTICE OF MOTION  
TO WAIVE TIME  
RESTRAINTS, STRIKE  
OBJECTIONS, AND TO  
COMPEL DEPOSITIONS**

Defendants.

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Plaintiff moves for an Order to waive the time restraints of Rule 26(d), F.R.Civ.P., for seeking the deposition of defendants' Master, Chief Mate, a shore based supervisory corporate officer, and a knowledgeable witness under Rule 30(b)(6), prior to receipt of the Court's formal Scheduling Order or a Rule 16(b) conference; to strike vessel defendants' informal letter objections; and for an Order compelling production of the vessel defendants' witnesses at the earliest opportunity while same are still in the employ of defendants.

Dated: September 7, 2007

KINGSLEY, KINGSLEY AND CALKINS

By:\_\_\_/S/\_\_\_\_\_  
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